

# EXHIBIT 8

*[Redacted Version]*

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*(Redacts Material from  
Conditionally Sealed Record)*

SUPERIOR COURT OF THE STATE OF CALIFORNIA  
COUNTY OF SAN FRANCISCO - UNLIMITED JURISDICTION

COORDINATION PROCEEDING  
SPECIAL TITLE (Rule 3.550)

No. CJC-21-005188

In Re: Uber Rideshare Cases

This document relates to:

ALL ACTIONS

UNREDACTED TRANSCRIPT - INCLUDES ALL TESTIMONY

CONFIDENTIAL - UNREDACTED

UNDER PROTECTIVE ORDER

VIDEO DEPOSITION OF ANDI PIMENTEL

VOLUME 1 - PAGES 1-284

TUESDAY, OCTOBER 15, 2024

SAN FRANCISCO, CALIFORNIA

Reported by: Marilyn Hoover, RPR

California CSR No. 8841

10:16

[REDACTED]

10:16

[REDACTED]

10:16

[REDACTED]

10:16

4 Q. When you became product manager for

10:16

5 dashcams, did you endeavor to learn what the company

10:16

6 had done and not done prior -- with respect to cameras

10:16

7 prior to you having that new job?

10:16

8 A. Yes. As with any new job, I tried to learn

10:17

9 as much as possible to be able to do well in my new

10:17

10 role.

10:17

11 Q. You tried to learn as much as possible about

10:17

12 the history of dashcam programs at Uber, so you could

10:17

13 do the new job of being a dashcam product manager?

10:17

14 A. Yeah.

10:17

[REDACTED]

10:17

[REDACTED]

10:17

[REDACTED]

10:17

[REDACTED]

10:17

[REDACTED]

10:17

[REDACTED]

10:17

[REDACTED]

10:17

[REDACTED]

10:18

[REDACTED]

10:18

[REDACTED]

10:18

[REDACTED]

18:24 1 A. Again, I don't know the exact date --

18:24 2 Q. Okay.

18:24 3 A. -- but that sounds about right.

18:24 4 Q. Were you involved as chief of staff in  
18:24 5 preparing any of these safety reports?

18:24 6 A. No.

18:24 7 Q. Do you know whether the executive leadership  
18:24 8 team had the final say in terms of the content of the  
18:24 9 U.S. safety report?

18:24 10 A. I don't know who had the final say.

18:24 11 Q. Do you -- Do you have -- Having been chief  
18:24 12 of staff to four executives, do you think it was at  
18:24 13 the executive decision-making level, "it" being the  
18:24 14 U.S. safety report and its contents; or do you think  
18:24 15 people could just work on something like this and put  
18:24 16 it out there in the world without consulting the  
18:24 17 executives?

18:24 18 A. No. With something that important,  
18:24 19 executives had to be involved.

18:25 20 Q. Okay. So you're agreeing that the  
18:25 21 executives were involved at some level in the -- in  
18:25 22 the preparation and publication of the U.S. safety  
18:25 23 reports?

18:25 24 A. Yes.

18:25 25 Q. Okay. And prior to December 5th, 2019, are

18:25 1 you aware of anything that was out there in the world  
18:25 2 that would have alerted a female passenger to the fact  
18:25 3 that there have been reports of sexual misconduct and  
18:25 4 sexual assault on the platform?

18:25 5 A. I don't know.

18:25 6 Q. Okay. Now, the U.S. safety report, it was  
18:25 7 released by Uber towards the end of 2019.

18:26 8 Do you know how it was released?

18:26 9 A. I don't.

18:26 10 Q. Okay. You don't know how it was sort of  
18:26 11 published and circulated?

18:26 12 A. I don't.

18:26 13 Q. Do you know how many riders know that there  
18:26 14 actually is a U.S. safety report?

18:26 15 A. I don't.

18:26 16 Q. Okay. There have been three.

18:26 17 Do you know how they would actually come to  
18:26 18 the attention of a passenger who was making a decision  
18:26 19 at night, let's say, after they've been drinking, as  
18:26 20 to whether or not to get into an Uber?

18:26 21 Do you know how passengers would come to  
18:26 22 learn that there even was such a thing as a U.S.  
18:26 23 safety report?

18:26 24 A. I don't know.

18:26 25 Q. Okay. Now, you can communicate with every

18:26 1 single -- "you" being Uber -- passenger via the app;  
18:26 2 correct?  
18:26 3 A. Yes.  
18:27 4 Q. And I get alerts from Uber. Promotions and  
18:27 5 things come to me as an Uber -- someone that, you  
18:27 6 know, is a customer, from time to time. Correct?  
18:27 7 A. I mean --  
18:27 8 Q. Regularly.  
18:27 9 A. -- that's more a question for you.  
18:27 10 Q. Okay. Well, this is a pretty good -- the  
18:27 11 phone and the app is a pretty good way of reaching all  
18:27 12 the Uber customers, isn't it?  
18:27 13 A. The app, yes.  
18:27 14 Q. Yeah. And so if I go on the home page of  
18:27 15 the app or anywhere else in the app, do I find  
18:27 16 anything mentioning any of the U.S. safety reports?  
18:27 17 A. I'm not sure. I don't work on that.  
18:27 18 Q. Okay. Do you know whether there's a link  
18:27 19 provided to the passengers through the app, saying,  
18:27 20 "We've just published this U.S. safety report  
18:27 21 reporting on sexual misconduct and sexual assaults,"  
18:28 22 you know, "Click here"?  
18:28 23 Do you know whether there's a link that says  
18:28 24 that within the app?  
18:28 25 A. I don't know if there's a link that says

18:28 1 that.

18:28 2 Q. In the earliest one, if you recall, there  
18:28 3 was a section on new safety technology.

18:28 4 Do you recall seeing that?

18:28 5 A. I would need to see it to see if I recall.

18:28 6 Q. Okay. I'm going to loan you my copy here.  
18:28 7 It's on page 11.

18:28 8 UNIDENTIFIED SPEAKER: We can put it in as  
18:28 9 an exhibit.

18:28 10 MR. LEVIN: Oh, you want to put it in?  
18:28 11 Okay.

18:28 12 UNIDENTIFIED SPEAKER: Well, if you want to  
18:28 13 use it.

18:28 14 (Sotto voce remarks.)

18:28 15 MR. LEVIN: These are quick questions, and I  
18:28 16 know Bob's hungry and it's past his bedtime.

18:29 17 MR. ATKINS: Here.

18:29 18 MR. LEVIN: Okay.

18:29 19 MR. ATKINS: All right. Whatever you want  
18:29 20 to do.

18:29 21 Q. BY MR. LEVIN: At page 10...

18:29 22 A. Oh, thank you. Okay.

18:29 23 (Sotto voce remarks.)

18:29 24 MR. ATKINS: Yeah, the court reporter has to  
18:29 25 mark it.

18:29 1 MR. LEVIN: Yeah, safety product experience.

18:29 2 MR. ATKINS: Do you want the court reporter

18:29 3 to mark it as an exhibit?

18:29 4 MR. LEVIN: Sure, whatever our next is.

18:29 5 MR. ATKINS: And what page?

18:29 6 MR. LEVIN: Page 10. And it goes on to page

18:29 7 -- that's it, just page 10.

18:29 8 (Reporter request.)

18:30 9 (Exhibit 127 marked.)

18:30 10 THE WITNESS: What page? Sorry.

18:30 11 MR. LEVIN: Ten. I think it's ten.

18:30 12 THE WITNESS: Okay.

18:30 13 MR. LEVIN: And this one -- I'm sorry. It's

18:30 14 11 and 12.

18:30 15 (Sotto voce remarks.)

18:30 16 UNIDENTIFIED SPEAKER: Do you have the 2017

18:30 17 one?

18:30 18 MR. LEVIN: You mean first one?

18:30 19 UNIDENTIFIED SPEAKER: Oh, no. Sorry. We

18:30 20 passed out the wrong one.

18:30 21 MR. LEVIN: Oh, you did?

18:30 22 THE WITNESS: I think we might need to

18:30 23 correct this.

18:30 24 MR. LEVIN: Well, keep it. We're going to

18:30 25 get to it.



18:30 1 THE WITNESS: Okay.

18:30 2 MR. ATKINS: You're running out of time.

18:30 3 MR. LEVIN: I know.

18:30 4 THE WITNESS: Okay.

18:30 5 MR. LEVIN: Thankfully, for everyone.

18:30 6 Thankfully.

18:31 7 (Exhibit 129 marked.)

18:31 8 (Discussion off record.)

18:31 9 MR. ATKINS: All right. Come on.

18:31 10 Q. BY MR. LEVIN: Okay. So do you see on

18:31 11 page 11 and 12 they discuss safety technology?

18:32 12 A. I do see that written here.

18:32 13 Q. And there's no mention in that section of

18:32 14 cameras?

18:32 15 A. I don't see that.

18:32 16 Q. Okay. Then let's go to the next safety

18:32 17 report --

18:32 18 MR. ATKINS: 129.

18:32 19 Q. BY MR. LEVIN: -- which is 2019 to 2020.

18:32 20 MR. ATKINS: I don't have that either. I

18:32 21 got the '22 one.

18:32 22 MR. LEVIN: Okay. We'll give it to you.

18:32 23 THE WITNESS: Which page? Sorry.

18:32 24 Q. BY MR. LEVIN: We are now on page 10.

18:32 25 A. Okay.

18:32 1 Q. And, for context, this is the 2019 to 2020  
18:32 2 U.S. safety report, but it's published June 30th,  
18:32 3 2022; and there's a section on page 10 about safety  
18:33 4 products.

18:33 5 Do you see that?

18:33 6 A. I do see that.

18:33 7 Q. Okay. And "cameras" is not mentioned;  
18:33 8 correct?

18:33 9 A. Cameras are --

18:33 10 MR. ATKINS: Read it. I trust Bill, but  
18:33 11 you're testifying under oath.

18:33 12 THE WITNESS: Correct, cameras are not  
18:33 13 mentioned.

18:33 14 Q. BY MR. LEVIN: Okay. But audio recording is  
18:33 15 appearing?

18:33 16 A. I do see audio recording appearing.

18:33 17 Q. Okay. And you're now -- At the time this  
18:33 18 was published, you were already product manager of  
18:33 19 cameras.

18:33 20 Do you know why cameras was not included as  
18:33 21 part of the safety product experience?

18:33 22 A. So this was published when? Can you remind  
18:34 23 me, please.

18:34 24 Q. It's published June 30th, 2022.

18:34 25 A. So I was not on recording yet --

18:34 1 Q. Okay.

18:34 2 A. -- officially.

18:34 3 Q. Okay. But, anyway, do you know why it  
18:34 4 wasn't published, why -- why cameras were not  
18:34 5 included?

18:34 6 A. I do not.

18:34 7 MR. LEVIN: All right. Then let's go to the  
18:34 8 last one.

18:34 9 MR. ATKINS: Thank you.

18:34 10 THE WITNESS: Thank you.

18:34 11 (Exhibit 130 marked.)

18:34 12 THE WITNESS: 130.

18:34 13 MR. ATKINS: Um-hum.

18:34 14 Q. BY MR. LEVIN: The U.S. safety report, 2021  
18:34 15 to 2022 --

18:34 16 A. Yes.

18:34 17 Q. -- which just was published this summer, I  
18:34 18 believe.

18:34 19 Does that sound about right to you?

18:34 20 A. That sounds about right. I don't remember  
18:34 21 the specific date.

18:34 22 Q. Okay. And do you see on page 7 it says:  
18:35 23 "Technology to drive accountability and deter bad  
18:35 24 behavior" at the top of the page?

18:35 25 A. You see that.

18:35 1 Q. Okay. And, actually, now, for the first  
18:35 2 time, there is a section on dashcams; correct?

18:35 3 A. That's what it looks like, yeah.

18:35 4 Q. And, in this section, it says: "We're  
18:35 5 investing in recording technology to promote  
18:35 6 accountability and deter bad behavior. Our aim is to  
18:35 7 reduce safety incidents and help provide better  
18:35 8 support to riders and drivers. We've worked to expand  
18:35 9 awareness and usage of existing features while  
18:35 10 designing new features that incorporate driver  
18:36 11 feedback, in line with the commitments that we made in  
18:36 12 our last safety report."

18:36 13 Do you see that?

18:36 14 A. I do see that.

18:36 15 Q. Okay. And then it says: "Dashcam  
18:36 16 registration. Drivers with dashcams can register them  
18:36 17 in the driver app and more easily share video footage  
18:36 18 with Uber. Uber can only view footage if drivers  
18:36 19 choose to share it when an incident is reported. Uber  
18:36 20 will also notify riders that their trip might be  
18:36 21 recorded if they're paired with a driver who has  
18:36 22 registered their dashcam."

18:36 23 Do you see that? I read it correctly?

18:36 24 A. I do see that, yes.

18:36 25 Q. Okay. And do you know why it is that the

18:36 1 dashcam registration program is appearing for the  
18:36 2 first time in the 2021 to 2022 U.S. safety report?

18:36 3 A. I don't know why.

18:36 4 Q. Okay. And it also talks about Record My  
18:37 5 Ride, further down.

18:37 6 A. I see that.

18:37 7 Q. And that's describing the in-app  
18:37 8 video-recording product; correct?

18:37 9 A. Yes.

18:37 10 Q. "Drivers can use the front-facing camera of  
18:37 11 their smartphone to record video without the added  
18:37 12 expense of a separate dashcam."

18:37 13 Right?

18:37 14 A. Right.

18:37 15 MR. LEVIN: I think, since we're going to  
18:37 16 have to resume anyway and we're coming close to the  
18:37 17 end of what we agreed today, and because we're not  
18:37 18 going tomorrow and because we don't know when we're  
18:37 19 going again, I think it makes sense for us to stop  
18:38 20 here --

18:38 21 THE WITNESS: Okay.

18:38 22 MR. LEVIN: -- so that people get to do  
18:38 23 whatever it is they need to do tonight as people, and  
18:38 24 we'll just resume when -- whenever we resume.

18:38 25 Okay?

1 STATE OF CALIFORNIA )  
 ) SS.  
2 COUNTY OF SAN FRANCISCO )

3 I, MARILYNN HOOVER, CSR No. 8841 for the State of  
4 California, do hereby certify:

5 That prior to being examined, the witness named  
6 in the foregoing deposition was duly sworn to testify  
7 the truth, the whole truth, and nothing but the truth;

8 That said deposition was taken down by me in  
9 shorthand at the time and place therein named, and  
10 thereafter reduced by me to typewritten form; and that  
11 the same is a true, correct, and complete transcript  
12 of the said proceedings.

13 Before completion of the deposition, review of  
14 the transcript [X] was [ ] was not requested. If  
15 requested, any changes made by the deponent (and  
16 provided to the reporter) during the period allowed  
17 shall be appended hereto.

18 I further certify that I am not interested in the  
19 outcome of the action.

20 Witness my hand this 18th day of October 2024.

21

22

23



24

Marilynn Hoover, RPR

25

California CSR No. 8841